IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16-CV-489-CWR-RHWR

HINDS COUNTY, ET AL.

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants Hinds County, Mississippi and Sheriff Tyree Jones, in his official capacity only ("Defendants") respectfully move the Court for an extension of time in which to file its reply in support of its Motion to Stay Pending Appeal. In support of this Motion, Defendants would show as follows:

- 1. On July 5, 2022 Defendants filed their Motion to Stay Pending Appeal. Doc. 91.
- 2. On July 19, 2022, Plaintiff filed its Response in Opposition to Defendants' Motion to Stay. Defendants' reply in support of their Motion to Stay is currently due July 26, 2022
- 3. Due to undersigned counsel being out of town from Thursday, July 21, through Monday, July 25, 2022, and co-counsel having to prepare and sit for another state's bar exam on Tuesday and Wednesday, July 26, and 27, 2022, Defendants respectfully request a three-day extension, up to and through July 29, 2022 to file their reply in support of Defendants' Motion to Stay Pending Appeal.
- 4. The extension is requested for good cause and not for delay. Plaintiff's counsel was contacted and does not oppose Defendants' request.
- 5. Given the nature of this request Defendants ask that the requirement of a separate memorandum in support be waived.

For these reasons, Defendants respectfully request a three-day extension, up to and through July 29, 2022, to file their reply in support of Defendants' Motion to Stay Pending Appeal.

THIS the 22nd day of July, 2022.

Respectfully submitted,

PHELPS DUNBAR LLP

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that I have this day had this motion electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification to all counsel of record.

This the 22nd day of July, 2022.

/<u>s/ Nicholas F. Morisani</u> Nicholas F. Morisani